

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

The Financial Oversight and Management Board for
Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS
(Jointly Administered)

**SECOND AMENDED INFORMATIVE MOTION AND NOTICE OF REQUEST
TO BE HEARD AT THE SEPTEMBER 21-22, 2022 OMNIBUS HEARING**

The Ad Hoc Group of PREPA Bondholders (the “**Ad Hoc Group**”) submits this second amended informative motion in response to the Court’s *Order Regarding Procedures for September 21-22, 2022, Omnibus Hearing* (the “**Order**”) setting forth guidelines for parties wishing to be heard at the September 21-22, 2022 omnibus hearing (the “**Hearing**”).

1. The Order requests that counsel who intend to speak at the Hearing file an informative motion identifying (a) the Party for which they intend to appear, (b) the name(s) and email address(es) of the attorney(s) who will appear, and (c) the Hearing matter(s) in connection with which the party-in-interest may wish to be heard.

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“**COFINA**”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“**HTA**”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“**ERS**”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“**PREPA**”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“**PBA**”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. Amy Caton, Alice J. Byowitz, Matthew M. Madden, and Gary A. Orseck of Kramer Levin Naftalis & Frankel LLP will appear on behalf of the Ad Hoc Group at the Hearing².

3. The Ad Hoc Group's legal representatives reserve the right to be heard on any matter concerning:

- (i) *Urgent Motion of Financial Oversight and Management Board for Order (I) Establishing Schedule to Continue Negotiations During Litigation of Gating Issues Pursuant to Litigation Schedule and (II) Granting Related Relief* (ECF No. 22269 in Case No. 17-03283 (LTS)), and any other responses or filings related to the foregoing;
- (ii) *Response by the Ad Hoc Group of PREPA Bondholders, Assured Guaranty Corp., Assured Guaranty Municipal Corp., National Public Finance Guarantee Corporation, and Syncora Guarantee Inc. to the Oversight Board's Urgent Motion to Set a Litigation Schedule, and Urgent Cross-Motion to Establish a Case Schedule and Impose Deadlines for a PREPA Plan of Adjustment* (ECF No. 22286 in Case No. 17-03283 (LTS)), and any other responses or filings related to the foregoing; and
- (iii) any matter scheduled for the Hearing or raised by any party at the Hearing related to the Title III cases, or any adversary proceeding pending in the Title III Cases, or the interests of the Ad Hoc Group.

[Remainder of Page Intentionally Left Blank]

² In compliance with ¶ 1 of the Order, only two attorneys will attend the hearing via Zoom at any given time.

We hereby certify that, on this same date, we electronically filed the foregoing with the clerk of the Court using the CM/ECF system, which will notify the attorneys of record.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, today September 19, 2022.

TORO COLÓN MULLET P.S.C.

P.O. Box 195383
San Juan, PR 00919-5383
Tel.: (787) 751-8999
Fax: (787) 763-7760

/s/ *Manuel Fernández-Bared*

MANUEL FERNÁNDEZ-BARED
USDC-PR No. 204,204
E-mail: mfb@tcm.law

/s/ *Linette Figueroa-Torres*

LINETTE FIGUEROA-TORRES
USDC-PR No. 227,104
E-mail: lft@tcm.law

/s/ *Nayda Perez-Roman*

NAYDA PEREZ-ROMAN
USDC-PR No. 300,208
E-mail: nperez@tcm.law

*Counsel for the Ad Hoc Group of PREPA
Bondholders*

**KRAMER LEVIN NAFTALIS &
FRANKEL LLP**

1177 Avenue of the Americas
New York, New York 10036
Tel.: (212) 715-9100
Fax: (212) 715-8000

/s/ *Alice J. Byowitz*

AMY CATON*
THOMAS MOERS MAYER*
ALICE J. BYOWITZ*
GARY A. ORSECK**
MATTHEW M. MADDEN**
Email: acaton@kramerlevin.com
tmayer@kramerlevin.com
abyowitz@kramerlevin.com
gorseck@kramerlevin.com
mmadden@kramerlevin.com

* *Admitted Pro Hac Vice*

** *Pro Hac Vice Admission Pending*

*Counsel for the Ad Hoc Group of
PREPA Bondholders*

EXHIBIT A

EXHIBIT A
PARTY APPEARANCE SHEET

Name of Party	Ad Hoc Group of PREPA Bondholders
Party Name Abbreviation (For use with Zoom)	PREPA Ad Hoc Group
<p>Attorney(s) Representing Party (provide the listed information for each attorney who may appear for the Party):</p> <ul style="list-style-type: none"> • Name, • Email, • Law Firm, • Phone Number • Docket Entry No. for the Attorney's Notice of Appearance • Zoom Screen Name (<u>See</u> September Omnibus Hearing Procedures Order, ¶ 8(a)) 	<p>Alice J. Byowitz abyowitz@kramerlevin.com Kramer Levin Naftalis & Frankel LLP (212) 715-9201 NOA: Dkt. No. 73 Zoom Screen Name: PREPA Ad Hoc Group / Byowitz, Alice / Kramer Levin Naftalis & Frankel LLP</p> <p>Amy Caton acaton@kramerlevin.com Kramer Levin Naftalis & Frankel LLP (212) 715-9201 NOA: Dkt. No. 73 Zoom Screen Name: PREPA Ad Hoc Group / Caton, Amy / Kramer Levin Naftalis & Frankel LLP</p> <p>Matthew M. Madden mmadden@kramerlevin.com Kramer Levin Naftalis & Frankel LLP (202)775-4529 NOA: Dkt. No. 73 Zoom Screen Name: PREPA Ad Hoc Group / Madden, Matthew / Kramer Levin Naftalis & Frankel LLP</p> <p>Gary A. Orseck gorseck@kramerlevin.com Kramer Levin Naftalis & Frankel LLP (202)775-4504</p>

	NOA: Dkt. No. 73 Zoom Screen Name: PREPA Ad Hoc Group / Orseck, Gary / Kramer Levin Naftalis & Frankel LLP
If a Party files a supplemental Party Appearance Sheet, the Party must include the Docket Entry No. of the original appearance sheet in the new filing which must be clearly marked as a “Supplemental” Party Appearance Sheet.	N/A
Note: Pursuant to the September Omnibus Hearing Procedures Order ¶ 1, the Financial Oversight and Management Board for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority shall each be limited to 4 attorneys appearing in the Zoom session at any given time, and each other party-in-interest shall be limited to 2 attorneys at any given time.	